REMARKS/ARGUMENTS

After the foregoing Amendment, claims 1-23 are currently pending in this application. Claims 1, 8, 18, and 22 have been amended to more distinctly claim subject matter which the Applicants regard as the invention. Applicants submit that no new matter has been introduced into the application by these amendments.

Claim Rejections - 35 U.S.C. §102

Claims 1-23 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 7,149,524 to Reynolds et al. The Applicants respectfully disagree with the Examiner.

The presently amended independent claims are directed toward a wireless transmit/receive unit (WTRU, as in claims 1 and 8), a wireless communication system (as in claim 18), and a method (as in claim 22) wherein quality of service (QoS) definitions are translated between multiple wireless communication systems. The pending claims aim to address a lack of standardization of QoS requirements across different types of wireless communication systems. See for example, Tables 1, 2, and 3 of the present application, where various examples of QoS mappings across different types of wireless communication systems are shown.

In contrast, Reynolds discloses a method wherein possible handovers that meet a minimum system requirement are identified, tested against the network policy of the mobile unit, and selected for handover. Reynolds is completely silent regarding any type of QoS requirement translation, as is claimed in every pending independent claim. Reynolds instead discloses a method including testing "handover against network policy" to see if the handover meets the system requirement (See Reynolds, column 5, lines 50-54.)

Reynolds further discloses as follows:

...handover manager 10 on receipt of a handover request or trigger are, firstly, to obtain and compare, if necessary, information relevant to the requested handover from a variety of sources including network policy data from network policy server 12, standing user preferences, which may be maintained in a user agent, mobile station capabilities from a terminal agent and security data from a security agent. Secondly, handover manager 10 identifies the best of all potential handovers taking into account the information obtained such as user preferences and network policy. Thirdly, the handover manager instructs the execution of the best available handover, if any. (See column 4, lines 36-49.)

Nowhere does Reynolds disclose the claimed translation of QoS requirements across two different wireless communication systems. Instead, Reynolds teaches a trial and error approach, wherein multiple attempts are made to communicate with various networks, and the network that offers the best QoS is selected for handover. (See generally Reynolds columns 5 and 6, descriptions of Figures 2-4.)

Reynolds further discloses that if "network policy is not met....it is tested...whether the call is to be treated as of a higher priority...." (See Reynolds, Col 5, Lines 50-60.) In sum, the handover manager disclosed by Reynolds' method does not *know* whether a particular handover meets the system requirement without testing it. In contrast, the pending claims eliminate testing whether a particular handover meets the system requirement and instead translates QoS requirements of a first communication system to equivalent requirements of a second communication system.

Claims 2-7 depend from claim 1, claims 9-17 depend from claim 8, claims 19-21 depend from claim 18, and claim 23 depends from claim 22, and are all believed to be allowable over Reynolds for at least the reasons presented above. Accordingly, withdrawal of the 35 U.S.C. §102(e) rejection of claims 1-23 is respectfully requested.

Conclusion

If the Examiner believes that any additional minor formal matters need to be addressed in order to place this application in condition for allowance, or that a telephone interview will help to materially advance the prosecution of this application, the Examiner is invited to contact the undersigned by telephone at the Examiner's convenience.

In view of the foregoing amendment and remarks, Applicants respectfully submit that the present application, including claims 1-23, is in condition for allowance and a notice to that effect is respectfully requested.

Respectfully submitted,

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